## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

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)	Docket No. 20-cr-10015-DJC
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)	

## **JOINT STATUS REPORT**

The Government and defendant Zaosong Zheng (together "the Parties") submit this interim Status Report in the above-captioned case, which is currently scheduled for a status conference on June 12, 2020.

The Government is not yet finished providing discovery to the defendant. The Government has provided considerable discovery to the defendant, including numerous documents and part of the contents of electronic devices seized from the defendant and his apartment. However, additional discovery, including the contents of seized electronic devices and laboratory test results not yet in the Government's possession, remain outstanding.

Due to the size of the files and the closure of defense counsels' offices, they have been unable to successfully view the computer image discovery thus far produced, which will require retention of an expert. Counsel has been consulting with their IT providers to try to view the files and the IT providers have referred counsel to an expert who is being retained to allow access to the files produced to date, and files yet to be produced.

The defendant may seek additional discovery after the Government's production is complete.

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The parties request an additional 60 days for the Government to complete discovery, and

for defense counsel to review the discovery already produced.

The Court previously excluded the time from the last status conference, April 13, 2020

until June 6, 2020, from Speedy Trial Act calculations in the interest of justice, pursuant to 18

U.S.C. § 3161(h)(7)(A). The Parties agree that the time from June 6, 2020 until the next status

conference should be excluded from Speedy Trial Act calculations in the interest of justice on the

ground that such time will enable the Government to complete discovery and the defendant to

continue to review the discovery as provided.

The Parties ask that the Court cancel the June 12, 2020 status hearing as the Parties have

nothing further to report.

Respectfully submitted,

ANDREW E. LELLING

UNITED STATES ATTORNEY

ZAOSONG ZHENG,

DEFENDANT

/s/ David Duncan

David Duncan, Esq.

Counsel for the Defendant

Jason A. Casev

Assistant U.S. Attorney

/s/ Jason A. Casey

CERTIFICATE OF SERVICE

By:

I hereby certify that the foregoing document filed through the ECF system will be sent electronically to counsel of records as identified on the Notice of Electronic Filing (NEF).

Date: June 5, 2020 /s/ Jason A. Casey

Jason A. Casey

Assistant U.S. Attorney